Emily Cooper OSB #182254
ecooper@droregon.org
Thomas Stenson OSB #152894
tstenson@droregon.org
Disability Rights Oregon
511 SW 10th Avenue, Suite 200
Portland, Oregon 97205
(503) 243-2081
Counsel for Plaintiff, Disability Rights Oregon

Jesse Merrithew OSB #074564
jesse@lmhlegal.com
Levi Merrithew Horst PC
610 SW Alder Street, Suite 415
Portland, Oregon 97205
(971) 229-1241
Counsel for Plaintiff, Metropolitan Public Defender

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

DISABILITY RIGHTS OREGON, METROPOLITAN PUBLIC DEFENDER SERVICES INC., and A.J. MADISON,

Plaintiffs,

VS.

JAMES SCHROEDER, in his official capacity as head of the Oregon Health Authority, and DOLORES MATTEUCCI, in her official capacity as Superintendent of the Oregon State Hospital,

Defendants,

and

LEGACY EMANUEL HOSPITAL & HEALTH CENTER d/b/a UNITY CENTER FOR BEHAVIORAL HEALTH; LEGACY

Case No. 3:02-cv-00339-MO (Lead Case) Case No. 3:21-cv-01637-MO (Member Case) Case No. 6:22-cv-01460-MO (Member Case)

JOINT STATUS REPORT

JOINT STATUS REPORT - 1 (Case No. 3:02-cv-00339-MO)

HEALTH SYSTEM; PEACEHEALTH; and PROVIDENCE HEALTH & SERVICES,

Intervenors.

JAROD BOWMAN, JOSHAWN DOUGLAS-SIMPSON,

Plaintiffs,

DOLORES MATTEUCCI, Superintendent of the Oregon State Hospital, in her individual and official capacity, JAMES SCHROEDER, Direction of the Oregon Health Authority, in his official capacity, and PATRICK ALLEN in his individual capacity,

Defendants,

and

LEGACY EMANUEL HOSPITAL & HEALTH CENTER d/b/a UNITY CENTER FOR BEHAVIORAL HEALTH; LEGACY HEALTH SYSTEM; PEACEHEALTH; and PROVIDENCE HEALTH & SERVICES OREGON,

Plaintiffs,

VS.

JAMES SCHROEDER, in his official capacity as Director of Oregon Health Authority,

Defendant.

Case No. 3:21-cv-01637-MO (Member Case)

Case No. 6:22-cv-01460-MO (Member Case)

The parties, party-intervenors, and amici continue to engage in discussions facilitated by Magistrate Judge Beckerman. The parties believe that significant progress is being made on identifying areas of conceptual agreement among the parties, intervenors, and amici. The parties JOINT STATUS REPORT - 2

LEVI MERRITHEW HORST PC

LEVI MERRITHEW HORST PC 610 SW ALDER ST. SUITE 415 PORTLAND, OR 97205 T: 971.229.1241 | F: 971.544.7092

(Case No. 3:02-cv-00339-MO)

wish to continue to engage in that process in hopes of avoiding further litigation. This may involve proposing amendments to the Court's September remedial order and a new proposed remedial order. Given the number of stakeholders involved in these discussions, more time is necessary to allow this process to play out. Therefore, the parties jointly and respectfully request that the Court postpone the briefing deadlines currently set for April 25, 2023 until May 9, 2023. The parties can provide another joint status report on or before May 5 if the Court requires.

DATED this 18th day of April, 2023.

LEVI MERRITHEW HORST PC

<u>/s Jesse Mer</u>rithew

Jesse Merrithew OSB # 074564 jesse@lmhlegal.com 610 SW Alder Street, Suite 415 Portland, Oregon 97205 Telephone: (971) 229-1241

Telephone: (9/1) 229-1241 Facsimile: (9/1) 544-7092

Counsel for Plaintiffs Metropolitan Public Defender, Jarrod Bowman, and Joshawn

Douglas-Simpson

DISABILITY RIGHTS OREGON

/s Emily Cooper

Emily Cooper OSB # 182254
ecooper@droregon.org
Thomas Stenson, OSB # 152894
tstenson@droregon.org
511 SW 10th, Suite 200
Portland OR 97205
Telephore (503) 243, 2081

Telephone: (503) 243 2081 Facsimile: (503) 243 1738

Counsel for Plaintiff Disability Rights Oregon

DEPARTMENT OF JUSTICE

/s Carla Scott

Carla Scott OSB # 054725 Carla.A.Scott@doj.state.or.us 100 SW Market Street Portland, Oregon 97201 Telephone: (971) 673-1880 Facsimile: (971) 673-5000

Facsimile: (9/1) 6/3-500 Counsel for Defendants